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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to
Develop an Electricity Integrated
Resource Planning Framework and to
Coordinate and Refine Long-Term
Procurement Planning Requirements.

Rulemaking 16-02-007

**ADMINISTRATIVE LAW JUDGE'S RULING DENYING, IN PART, AND
GRANTING, IN PART, MOTION OF CALIFORNIA COMMUNITY CHOICE
ASSOCIATION FOR AMENDED RULING AND EXTENSION OF TIME**

This ruling denies the portion of the July 1, 2019 California Community Choice Association's (CalCCA's) Motion for Amended Ruling and Extension of Time that seeks an amended ruling, but grants the portion that seeks an extension of time. The request for an amended ruling is moot, because all of the information sought by CalCCA in its Motion was already contained in the June 20, 2019 Assigned Commissioner and Administrative Law Judge's Ruling Initiating Procurement Track and Seeking Comment on Potential Reliability Issues. The request for an extension of time is partially granted. Comments in response to the June 20, 2019 Ruling will be due July 22, 2019, with reply comments due July 31, 2019.

1. Background

On July 1, 2019, the California Community Choice Association (CalCCA) filed a Motion for Amended Ruling and Extension of Time (Motion). The request was for an amended ruling modifying the June 20, 2019 Assigned Commissioner and Administrative Law Judge's Ruling Initiating Procurement Track and

Seeking Comment on Potential Reliability Issues (Ruling). CalCCA also requested an extension of time, with comments due July 29, 2019 and reply comments August 9, 2019.

In addition, CalCCA filed a concurrent Motion to Shorten Time to Respond to Motion for Amended Ruling and Extension of Time (Motion to Shorten Time), requesting that parties be required to file responses on July 5, 2019, instead of the usual 15 days normally allotted for responding to motions under Rule 11.1(e) of the Commission's Rules of Practice and Procedure.

2. Discussion

The portion of the July 1, 2019 CalCCA Motion that seeks an amended ruling modifying the June 20, 2019 Ruling, requested the following information:

- (1) Data sources;
- (2) Inputs;
- (3) Assumptions;
- (4) Calculation methodology; and
- (5) Outputs.¹

CalCCA also requested that an amended ruling make clear:

- Staff's assumptions regarding the degree of "slack capacity" assumed in its analysis;
- The extent to which the proposed changes in Effective Load Carrying Capability (ELCC) factors affects the Staff's conclusions; and

¹ July 1, 2019 Motion of CalCCA at 3.

- The nature of the resources the ruling would direct SCE [Southern California Edison] to re-contract; specifically, whether these resources are local capacity resources and/or flexible capacity resources or otherwise provide any value apart from system RA [resource adequacy] value.²

The June 20, 2019 Ruling itself contains all of the information necessary for parties to be responsive to the Ruling. Pages 6-13 of the Ruling, as well as the associated footnotes, contain an extensive discussion of data sources, inputs, and assumptions. CalCCA's use of the terms "inputs," "calculation methodology," and "outputs" suggest that they assume a complex model was used to generate the supply stack included in the Ruling. The "methodology" used, as described in the Ruling, was simple math, adding together net qualifying capacity information that is already cited and described in the Ruling.

In response to CalCCA's question about "slack capacity," which was not discussed in the Ruling, staff made no assumption about slack capacity, which is why it was not discussed. ELCC assumptions are also described in the Ruling on Page 8. Since the Ruling was issued, the new ELCC factors have been adopted by the Commission in the resource adequacy rulemaking (R.17-09-020). Finally, with respect to the question about the nature of capacity that SCE would be required to contract, the answer is system capacity, since that is the general context of the analysis.

Overall, the purpose of the June 20, 2019 Ruling and seeking party input in response to it, was not to focus on the details of any particular staff analysis, but rather to invite parties to present their own analyses utilizing the publicly-available information referred to in the Ruling. CalCCA seems to

² July 1, 2019 Motion of CalCCA at 3.

implicitly assume, in the questions in its Motion, that there is a direct relationship between the staff analysis and the suggested capacity procurement volumes proposed in the Ruling; there is not. That relationship is purely directional and indicative, not exact. This was intentional. The suggested procurement levels are not “outputs” of any staff analysis.

Parties are invited and encouraged to present alternative views, analyses, or proposals in their responses to the Ruling. For example, with respect to the capacity proposed to be re-contracted by SCE, parties may believe that there is a need for retention of local or flexible capacity in addition to or instead of system capacity. Parties are also free to suggest whether different levels of required procurement are appropriate, based on the same publicly-available data sources or other alternative data sources. Parties should be as specific as possible about the data sources and assumptions they are using to present their views and proposals.

With respect to CalCCA’s Motion to Shorten Time, I communicated by electronic mail to the service list of this proceeding on July 3, 2019 my intention to deny the substance of the CalCCA Motion, but grant the request for extension of time. Thus, there was no need for parties to file responses to the Motion to Shorten Time on July 5, 2019, and therefore that Motion to Shorten Time is denied as moot.

IT IS RULED that:

1. The portion of the July 1, 2019 California Community Choice Association’s Motion for Amended Ruling and Extension of Time that requests an amended ruling is denied as moot.

2. The portion of the July 1, 2019 California Community Choice Association's Motion for Amended Ruling and Extension of Time that requests an extension of time is partially granted.

3. Comments in response to the June 20, 2019 Assigned Commissioner and Administrative Law Judge's Ruling Initiating Procurement Track and Seeking Comment on Potential Reliability Issues shall be filed and served by no later than July 22, 2019.

4. Reply comments in response to the June 20, 2019 Assigned Commissioner and Administrative Law Judge's Ruling Initiating Procurement Track and Seeking Comment on Potential Reliability Issues shall be filed and served by no later than July 31, 2019.

5. The July 1, 2019 California Community Choice Association's Motion to Shorten Time to Respond to Motion for Amended Ruling and Extension of Time is denied as moot.

Dated July 11, 2019, at San Francisco, California.

/s/ JULIE A. FITCH
Julie A. Fitch
Administrative Law Judge